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Additionally, the deadline for Defendant's sentencing submission is July 1, 2024. The Government's sentencing submission is due July 8, 2024.

The Clerk of Court is respectfully directed to terminate the motion sequence pending at Doc. 13.

SO ORDERED.

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Philip M. Halpern

United States District Judge

Dated: White Plains, New York February 28, 2024

BY ECF

The Honorable Philip M. Halpern United States District Judge Southern District of New York United States Courthouse 300 Quarropas Street White Plains, New York 10601

Re: United States v. Ousman Jobe, 24 Cr. 31 (PMH)

Dear Judge Halpern:

The Government writes, with the consent of defense counsel, to respectfully request a 60-day adjournment of the deadlines set for the U.S. Probation Department to prepare Mr. Jobe's presentence investigation report.

As the Court is aware, Mr. Jobe recently testified as a cooperating witness in the trial of *United States v. Carter, et al.*, 21 Cr. 681 (NSR), at which all three defendants were convicted. Prior to the start of trial, on January 19 and 31, 2024, the defendant pled guilty to a three-count Information for the following charges: (1) wire fraud conspiracy, in violation of 18 U.S.C. § 1349; (2) wire fraud, in violation of 18 U.S.C. § 1343; and (3) aggravated identity theft, in violation of 18 U.S.C. § 1028A. Probation's deadline to interview Mr. Jobe for its presentence investigation is March 1. The first disclosure of Probation's presentence investigation report is due March 18, and the second is due April 15. Mr. Jobe is not scheduled to be sentenced until July 18, 2024.

The three defendants convicted at trial will be sentenced on May 29, 2024. In light of Mr. Jobe's cooperation and testimony at trial, information about the defendants' sentences will be relevant to include in Mr. Jobe's presentence investigation report. Accordingly, the Parties respectfully request that Probation be given additional time to finalize its presentence investigation report to account for the defendants' May 29, 2024 sentencing.

In accordance with the above, the Parties propose the following schedule for Probation to complete its pretrial investigation report:

April 30, 2024: Probation Presentence Interview

May 17, 2024: First Disclosure of Presentence Report

¹ As the Court is aware, due to an error with the Court's recording technology on January 19, a complete transcript of the plea hearing was not available. The Parties convened again on January 31 to make a complete record of Mr. Jobe's plea.

June 14, 2023: Second Disclosure of Presentence Report

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney Southern District of New York

By: /s/ Jared D. Hoffman
Jared D. Hoffman
Jeffrey C. Coffman
Courtney L. Heavey
Assistant United States Attorneys

cc:

Lorraine Gauli-Rufo, Esq. Hannah Eaves, Esq. Counsel for Defendant

Michelle Millan, U.S. Probation Officer Specialist